



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3d Floor
New York, New York 10007

January 22, 2008

BY HAND

The Honorable Deborah C. Freeman
United States Magistrate Judge
Daniel Patrick Moynihan United
States Courthouse
500 Pearl Street, Room 525
New York, NY 10007

JAN 23 2008

Re: *Jackson v. Executive Office for United States Attorneys*,
No. 07 Civ. 6591 (RJH)(DCF)

SO ORDERED:

DATE: 1/25/08

.....
DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

Dear Judge Freeman:

MEMO ENDORSED

I write respectfully to request a 60-day extension of the time for the Government to answer or move with respect to the above-referenced action brought by *pro se* plaintiff Sharon Jackson, such that the Government's motion or answer would be due on or before March 24, 2008.¹ This is the Government's first request for an extension of time in this matter.

We make this request because plaintiff's prolix complaint appears to assert numerous causes of action, including: (1) claims under the Freedom of Information Act; (2) a challenge to the criminal conviction for which she is currently incarcerated; and (3) a claim for injunctive relief based on a wide-ranging conspiracy involving, among other entities, the Village of Spring Valley Police Department and the County of Rockland Narcotics Task Force to violate the constitutional rights of African Americans and Hispanics. The Government needs this additional time to fully assess the scope of plaintiff's complaint and to determine the nature, if any, of the motion to dismiss that the Government can file in response to the complaint. We have not sought plaintiff's consent to this request as she is incarcerated and unrepresented by counsel.

¹ The docket in this matter indicates that plaintiff purportedly served the Executive Office for United States Attorneys ("EOUSA") on November 23, 2007, and that the Government's answer or motion would therefore be due by January 22, 2008. This Office has not yet confirmed whether plaintiff, in fact, properly served EOUSA in accordance with Rule 4 of the Federal Rules of Civil Procedure.

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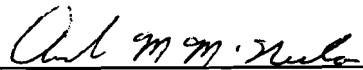
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Thank you for your consideration of this request.

Respectfully submitted,

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United States Attorney
for the Southern District of New York

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